

ZEMAN & WOMBLE, LLP

KEN WOMBLE
20 VESEY STREET, RM 400
NEW YORK, NY 10007

P (718) 514 - 9100
F (917) 210 - 3700

WOMBLE@ZEMANWOMBLELAW.COM

WWW.ZEMANWOMBLELAW.COM

April 10, 2020

BY ECF & EMAIL

Hon. J. Paul Oetken

United States District Judge

Southern District of New York

Thurgood Marshall United States Courthouse

40 Foley Square

New York, NY 10007

Re: *USA v. Mario Alberto Ramos*
20 Cr. 29 (JPO)

Dear Judge Oetken:

I represent Mario Alberto Ramos in the above-referenced matter. I write to withdraw our previously filed motion requesting temporary release for Mr. Ramos (filed April 1, 2020; Dkt. 15).

On March 26, 2020, I was informed that Mr. Ramos had been identified by the Metropolitan Detention Center ("MDC") as a "potentially vulnerable inmate." That same day, I reached out to Mr. Ramos' family to update them on his status and discuss any possibilities for temporary release. Mr. Ramos' sons stated that they would be willing and able to drive to New York City and secure a residence where they could stay with their father. Since March 26, I have had almost daily conversations with Mr. Ramos' sons and daughter to ensure not only that this plan was logistically feasible, but also financially possible. I was consistently assured that the family had contacted people in New York and formulated what we were calling an "action plan" so that if the Court were to grant temporary release, that his sons would be prepared to travel from California, secure the necessary supplies and find a temporary residence in New York.

I remained in contact with the Ramos family after our motion was filed and kept them updated as to the hearing schedule and the prospective date of decision on our motion. The Ramos family remained firm that should the Court grant our application, that both sons would immediately leave California for New York.

At the conclusion of the April 8, 2020 hearing, I contacted both of Mr. Ramos' sons and his daughter and requested relevant information and informed them that the Court's decision would be coming likely by April 10, 2020.

On April 9, 2020, I was contacted by Mr. Ramos' son. He informed me that the

Ramos family had just had a meeting where they had decided that they would not be traveling to New York should the Court grant our application. As this formed the foundation of our proposed release conditions, I immediately contacted the Court and government, and am following up with this letter to explain the withdrawal of our motion requesting temporary release.

I appreciate the Court's attention to this matter and wish everyone a safe and healthy journey through this uncertain time.

Sincerely,

Ken Womble

Ken Womble
Zeman & Womble, LLP
Counsel for Mario Alberto Ramos

Cc: AUSA Daniel Nessim

Defendant's motion for release on bail is hereby deemed withdrawn.
The Clerk of Court is directed to close the motions at Docket Numbers 15 and 18.
So ordered.
April 14, 2020



J. PAUL OETKEN
United States District Judge